

TIMOTHY M. BURGESS United States Attorney

2005 DEC -9 PM 4: 10

STEPHAN A. COLLINS Assistant U.S. Attorney Federal Building & U.S. Courthouse 222 West Seventh Avenue, #9 Anchorage, Alaska 99513-7567 (907) 271-5071

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

| UNITED STATES OF AMERICA, |) Case No. A05-108 CR (JWS) |
|-------------------------------------|---|
| Plaintiff, |))) MOTION TO SET TRIAL SETTING |
| VS. | ONFERENCE BEFORE THE DISTRICT COURT |
| CARLOS LIKEE RAINEY, a/k/a |) |
| Carlos Likee Dishon Johnson-Rainey, |) |
| "C", and "CJ"; SHANNON DAWN |) . |
| RAINEY, a/k/a Shannon Jackson, |) |
| a/k/a Shannon Hicks; D'ANDRE |) |
| TOLBERT, a/k/a "Dre"; DAMON |) |
| STEVENS, a/k/a "D'Mo"; RICHARD |) |
| JAMES MCKINNON; JOSHUA |) |
| PRICE PLUID; KRISTA ANN |) |
| CALLAN; ALEXANDER BOOKER; |) |
| ALFREDO MARTINEZ, a/k/a |) |
| "Spike"; FRANCISCO MARTINEZ, |) |
| a/k/a "Money"; and ISAI |) |
| HERNANDEZ, |) |
| |) |
| Defendants |) |

The United States moves this court to schedule a trial setting conference before the district court. With the exception of Francisco Martinez, all of the defendants in this matter have been arrested. With the exception of Isai Hernandez and Afredo Martinez, all of the defendants in custody have appeared for their respective arraignments in the District of Alaska and have had counsel either appointed or retained to represent them. The court has set trial dates of January 25 and February 13, 2006 in this matter.

Because of the volume and nature of the discovery in this matter, the nature of the charges, and the number of defendants charged in the indictment, the United States requests an appearance before the court with all defense counsel to meet and confer with the court about the anticipated need by defense counsel for additional time to prepare for pre-trial motion practice and trial on the currently set dates. The United States requests the court set this matter on at the earliest date available so that the court can address any issues that will affect the trial dates set in this matter. The United States submits that holding this conference at the

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earliest possible time will help avoid any possible delay in proceeding with the trials in this matter.

RESPECTFULLY SUBMITTED this day, December 9, 2005, in Anchorage, Alaska.

> TIMOTHY M. BURGESS United States Attorney

STEPHAN A. COLLINS Assistant U.S. Attorney

Filed 12/09/2005

I declare under penalty of perjury that a true and correct copy of the foregoing was sent to the following counsel of record on December 9, 2005, via:

(✔) FAX

Herman G. Walker, Jr. (Counsel for ▲ Carlos Rainey) 606 E Street, Ste. 203 Anchorage, AK 99501 Tele: 279-2889

Fax: 258-4428

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T. Burke Wonnell (Counsel for ▲ D'Andre Tolbert) 2600 Denali St., Ste. 460 Anchorage, AK 99503 Tele: 276-8008 Fax: 278-8571

Mark A. Rosenbaum (Counsel for ▲ Damon Stevens) 4940 Byrd Lane, Ste. 100 Anchorage, AK 99502 Fax: (907) 243-2609

Michael Dieni (Counsel for ▲ Richard McKinnon) Federal Public Defender Agency 550 W. 7th Ave., #1600 Anchorage, AK 99501 Fax: (907) 646-3480

Scott Sterling, Esq. (Counsel for A Joshua Pluid) 851 E. Westpoint Drive Suite 201 Wasilla, AK 99654 Tele: 376-8076 Fax: 376-8078

Lance C. Wells (Counsel for ▲ Krista Callan) 733 West 4th, Suite 308 Anchorage, AK 99501 Fax: (907) 277-9859

John C. Pharr (Counsel for ▲ Alexander Booker) 733 W. 4th Ave., Suite 308 Anchorage, AK 99501 Fax: (907) 277-9859

Executed at Anchorage, Alaska, on December 9, 2005.

Office of the U.S. Attorney

CERTIFICATE OF SERVICE

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